

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

RIPPLE LABS, INC., BRADLEY GARLINGHOUSE, and
CHRISTIAN A. LARSEN,

Defendants,

and

JORDAN DEATON, JAMES LAMONTE,
TYLER LAMONTE, MYA LAMONTE,
MITCHELL MCKENNA, KRISTIANA WARNER and
ALL SIMILARLY SITUATED XRP HOLDERS,

Proposed
Intervenors.

**20-cv-10832 (AT) (SN)
(S.D.N.Y.)**

DECLARATION OF JOHN E. DEATON

I, John E. Deaton, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am an attorney admitted to practice before this Court *pro hac vice* and the managing partner of The Deaton Law Firm, LLC., and I am counsel to Proposed Intervenor-Defendants in the above-captioned action.
2. I respectfully submit this declaration in support of the Proposed Intervenors' Memorandum in reply to Plaintiff's Opposition to Proposed Intervenors' Motion to Intervene.
3. Attached hereto as Exhibit A is a true and correct copy of Media Criticism of SEC Leadership.

4. Attached hereto as Exhibit B is a true and correct copy of various Twitter posts by John Deaton
5. Attached hereto as Exhibit C is a true and correct copy of John Deaton's satirical mock examination of Jay Clayton available here
<https://www.youtube.com/watch?v=qawpQ-242WI>
6. Attached hereto as Exhibit D is a true and correct copy of Media Criticism of SEC Enforcement Action
7. Attached hereto as Exhibit E is a true and correct copy of *Cambridge Dictionary* definition of incompetent in English.

Executed on May 17, 2021, in East Providence, Rhode Island.

Respectfully Submitted,

/s/John E. Deaton

John E. Deaton